

1 Perry J. Narancic (CA Bar No. 206820)
pnarancic@nk-pc.com
2 Barry Lee Katzman (CA Bar No. 105851)
blkatman@nk-pc.com
3 NARANCIC & KATZMAN, P.C.
325 Sharon Park Drive, #736
4 Menlo Park, California 94025
5 Telephone: (650) 814-7688
Facsimile: (650) 618-2700

6 Attorneys for Defendant
7 BUSINESS APPLICATIONS PERFORMANCE CORPORATION

8
9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN JOSE DIVISION**

12) CASE NO.: 5:09-CV-02889-JW
13)
14) **IN RE INTEL LAPTOP BATTERY**
LITIGATION) **STIPULATION AND [PROPOSED]**
15) **ORDER RE ADMINISTRATIVE**
16) **MOTION FOR SEALING ORDER**
17) **PURSUANT TO LOCAL RULE 79-5(d)**

18
19
20
21
22
23
24
25
26
27
28
Complaint Filed: June 26, 2009
Trial Date: None
Discovery Cutoff: None

Whereas Plaintiffs filed a Motion for Class certification on Oct. 22, 2010, which contain certain documents designated as confidential under the Stipulated Protective Order [D.E. 54] by the producing parties (the “Designated Documents”);

Whereas the Plaintiffs served an Administrative Motion for a Sealing Order pursuant to Local Rule 79-5(d) which provides an opportunity for the producing parties to establish that the designated information is sealable;

1 The parties identified below hereby stipulate that the producing parties shall prepare and
2 lodge any such statements relating to the Designated Documents no later than Friday November 5,
3 2010. The parties further stipulate that Plaintiffs shall have until Friday, November 12, 2010, to
4 respond to the producing parties' statements.
5

6 IT IS SO STIPULATED.

7 DATED: October 29, 2010 GIRARD GIBBS LLP

8 By: s/ Geoffrey A. Munroe
9 Geoffrey A. Munroe

10 Interim Class Counsel for Plaintiffs

11 DATED: October 29, 2010 PERKINS COIE BROWN & BAIN P.A.

12 By: Philip A. Leider

13
14 Attorneys for Defendant
15 INTEL CORPORATION

16 DATED: October 29, 2010 NARANCIC & KATZMAN, PC

17 By: s/ Perry J. Narancic
18 Perry J. Narancic

19 Attorneys for Defendant
20 BUSINESS APPLICATIONS
21 PERFORMANCE CORPORATION

22 DATED: October 29, 2010 WINSTON & STRAWN, LLP

23 By: s/ Krista Enns
24 Krista Enns

25 Attorneys for
26 DELL INC.
27
28

1
2 DATED: October 29, 2010

KILPATRICK STOCKTON LLP

3 By: s/ Raymond M. Bennett
4 Raymond M. Bennett

5 Attorneys for
6 LENOVO GROUP LIMITED

7
8 [PROPOSED] ORDER

9 Good cause appearing therefore, IT IS SO ORDERED.

10
11 Dated: November 5, 2010

12 James Wase
13 United States District Judge